

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI

ANDREW JOHNSON  Plaintiff  v. JOHNSON & JOHNSON, et. al.  Defendant(s)	Case No.: 1:16-cv-00224-SNL  PLAINTIFF'S MOTION
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**PLAINTIFF'S MOTION FOR AN EXTENSION OF TIME TO FILE AN AMENDED  
COMPLAINT OR IN THE ALTERNATIVE A STAY ON THE ACTION**

Counsel for Plaintiff, Andrew Johnson make this motion for extension of time to file an amended complaint or in the alternative requests a stay on the entire action in response to the Memorandum and Order entered on August 30, 2016. On August 17, 2015 the United States Judicial Panel granted the application for a Multi-District Litigation for the class of drugs called Fluoroquinolone Products, MDL No. 2642. Plaintiff, Andrew Johnson's claim involves a Fluoroquinolone designated for inclusion into the Multi-District Litigation in the United States District Court, District of Minnesota, MDL No. 2642.

Plaintiff's complaint was initially filed in this Court on August 29, 2016. Plaintiff filed a Notice of Tag Along action in the Judicial Panel of Multi-District Litigation on September 6, 2016. Andrew Johnson's complaint will be transferred to the Multi-District Litigation in the District of Minnesota. (IN RE: FLUOROQUINOLONE PRODUCTS LIABILITY LITIGATION, 15-MD-2642).

Plaintiff's counsel received the conditional transfer order on September 12, 2016 from the United States Judicial Panel for Multi-District Litigation. (See Exhibit A).

WHEREFORE, Plaintiff hereby respectfully requests the Court enter an order extending the time to file an amended complaint by thirty (30) days in response to the Memorandum and Order entered on August 30, 2016 or in the alternative grant a stay on the entire action until this action is transferred.

Respectfully submitted this 12<sup>th</sup> day of September, 2016.

/s/: Randi Kassan, Esq.

Randi Kassan, Esq.

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*Attorney for Andrew Johnson*

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

ANDREW JOHNSON

Case No.: 1:16-cv-00224-SNL

Plaintiff

v.

JOHNSON & JOHNSON, et. al.

**CERTIFICATE OF SERVICE**

Defendant(s)

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Motion was served upon all parties of record electronically by CM/ECF, on September 12, 2016.

Respectfully submitted this 12<sup>th</sup> day of September, 2016.

/s/: Randi Kassan, Esq.

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